

REMARKS

Claims 1-8 were pending in the application at the time the present Office Action was mailed. Claims 1-3 and 5-7 are amended to clarify aspects of the applicants' technology and improve readability. Claims 4 and 8 are cancelled. Claims 9-22 have been added in this response. Accordingly, claims 1-7 and 9-22 are pending.

The Office Action rejected claims 1-8 as being unpatentable under 35 U.S.C. § 103(a) over U.S. Patent No. 6,189,045 ("O'Shea") in view of U.S. Patent No. 6,446,036 ("Bourbonnais"). The applicants respectfully traverse these rejections.

The applicants' technology is directed to converting an application from a natural language to a preferred natural language, and formatting the content of the application with regional settings corresponding to the preferred language. Formatting the content may include, e.g., changing the order of the numbers comprising a date from an American to a European format or changing the representation of a number's commas and periods. (See, e.g., the applicants' specification at 10:7-17.) The applicants' technology may perform the converting or formatting dynamically at the time a server receives a request from a client to provide the application request. The applicants' technology may also perform the converting or formatting on dynamically created text of an application (e.g., text created by script of an Active Server Page, or "ASP.")

O'Shea is directed to language and data type conversion. In O'Shea's technique, data from a "data producer" is converted to one or more data types (e.g., languages) and stored in multiple databases corresponding to the data types so that a "data consumer" can retrieve data of an appropriate type. (See, e.g., O'Shea, Figure 3.) As an example, a "forum discussion" may be translated to multiple natural languages and stored in several databases corresponding to the languages. (O'Shea, 4:38-54.) More specifically, "the forum data from the data producer 14 is converted and integrated into one or more converted databases." (O'Shea, 4:55-57.) Thus, in O'Shea's technique, data is converted and stored in static databases.

Bourbonnais is directed to a "teletranslation" system that translates a document from one natural language to another. This technique retrieves documents of a variety of formats (e.g., "plain text; HTML; OTEXT; Microsoft Word RTF; Microsoft Word DOC; and Adobe Acrobat PDF;" Bourbonnais, 6:18-27), and processes the documents such that a machine translation engine can translate the documents into a natural language. (See, e.g., Bourbonnais, Figure 1.) The processing includes converting the format, improving text, tagging words, etc. Thus, Bourbonnais' technique is limited to translating information stored in static files.

Neither O'Shea nor Bourbonnais teach or suggest dynamically formatting content or formatting dynamically created content. The applicants' background section specifically identifies a drawback of O'Shea's technique that the applicants' technology attempts to solve: a need for separate sets of web pages. (See the applicants' specification at 2:5-10.) O'Shea's technique would store each translated set of web pages in a separate database. In contrast, the applicants' technology converts an application's pages and formats them dynamically when the pages are requested. Furthermore, neither O'Shea nor Bourbonnais indicate that dynamically created content of an application (e.g., created by an ASP) can be converted and formatted.

The applicants have amended independent claims 1 and 5 to recite dynamically formatting. Because dynamically formatting is neither taught nor suggested by the applied references, the applicants respectfully submit that the independent claims, as revised, are now allowable over these references. The dependent claims import the limitations of the independent claims from which they depend and so are allowable for similar reasons.


Newly added claims 9-22 also recite dynamic formatting, and are so patentable over the applied references for similar reasons.

In view of the foregoing, the claims pending in the application comply with the requirements of 35 U.S.C. § 112 and patentably define over the applied art. A Notice of

Allowance is, therefore, respectfully requested. If the Examiner has any questions or believes that a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-6478.

Dated: October 6, 2004

Respectfully submitted,

By 
Rajiv P. Sarathy
Registration No.: 55,592

PERKINS COIE LLP
P.O. Box 1247
Seattle, Washington 98111-1247
(206) 359-8000
(206) 359-7198 (Fax)
Attorney for Applicant